

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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DAMIEN S. HEWLETT,

Plaintiff,

v.

Case No.: 22-cv-1376

JASON HILL and ZACHARY LANGE,

Defendants.

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**DECLARATION OF KIMBERLEY CY. MOTLEY IN SUPPORT OF  
PLAINTIFF'S AMENDED MOTION IN LIMINE – NUMBER 19 (Dkt. #87)**

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Pursuant to 28 U.S.C. § 1746, the undersigned, Kimberley Cy. Motley., makes the following statements under penalty of perjury under the laws of the United States.

1. I am an attorney duly licensed to practice law in the State of Wisconsin and before this Court.
2. I represent Plaintiff in the above-captioned case.
3. This Declaration is made in support of statements and representations made in Plaintiffs' Expedited Motion to Compel Discovery.
4. Attached hereto and incorporated herein as **Exhibit A** is Bates DOC0103 provided by Defendants.
5. Attached hereto and incorporated herein as **Exhibit B** is Bates DOC0098 provided by Defendants.
6. Attached hereto and incorporated herein as **Exhibit C** is an email sent on September 11, 2024, from Attorney Kimberley Cy. Motley to DOJ Attorney Sarah Huck.
7. Attached hereto and incorporated herein as **Exhibit D** is an email sent on

September 18, 2024, from Attorney Kimberley Cy. Motley to DOJ Attorney Sarah Huck.

8. Attached hereto and incorporated herein as **Exhibit E** is an email sent on September 24, 2024, from Attorney Kimberley Cy. Motley to DOJ Attorney Sarah Huck.

9. Attached hereto and incorporated herein as **Exhibit F** is letter sent on September 18, 2024, to Attorney Kimberley Cy. Motley from DOJ Attorney Sarah Huck by email.

Executed this 24<sup>th</sup> day of September 2024.

/s/Kimberley Cy. Motley  
Kimberley Cy. Motley